REMARKS/ARGUMENTS

Upon entry of the present amendment, claims 25-26 will have been canceled without prejudice or disclaimer. Claims 19, 22-24, and 27-28 will have been amended for consideration by the Examiner. In view of the above, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicants would like to thank the Examiner for the detailed Office Action provided.

In the outstanding Official Action, claims 19-28 were rejected under 35 U.S.C. § 103(a) over GUEDALIA et al,. (U.S. Patent No. 6,148,333) in view of KRASLAVSKY et al., (U.S. Patent No. 5,537,626). Claim 20 was rejected under 35 U.S.C. § 103(a) over GUEDALIA et al., in view of KRASLAVSKY et al., in further view of NAKAO et al., (U.S. Patent Publication No. 2001/0054152). Further, claims 22, 23, 24 and 28 were rejected under 35 U.S.C. § 103(a) over GUEDALIA et al., in view of STEFIK et al., (U.S. Patent Publication No. 2001/0008557).

As noted above, claims 25-26 will have been canceled without prejudice or disclaimer, and claims 19, 22-24, and 27-28 will have been amended and submitted for reconsideration. Applicants respectfully traverse the above rejections based on the pending claims and will discuss the rejections with respect to the pending claims in the present application, as will be set forth hereinbelow. The claims have been amended merely to clarify the subject matter, but not to narrow the scope of the claims.

Applicants' claims 19-21 generally relate to a server connectable to a terminal apparatus and to a first printer via a network. The terminal apparatus is connected to a second printer and the server is not connected to the second printer. The server includes a first memory that stores

original data without a water-mark, and a second memory that stores a water-mark associated with a user ID of a user of the terminal apparatus. The second memory stores a plurality of the watermarks, at least one of the plurality of the watermarks is associated with each of a plurality of user IDs. The server also has a third memory that stores an access right associated with each of the plurality of the user IDs. The server further has a controller that, when one of a plurality of users requests the server to display the original data on a display of the terminal apparatus by inputting the user ID of the one of the plurality of the users, transforms the original data into image data, to select the water-mark associated with the user ID of the one of the plurality of the users. The controller adds the selected water-mark to the image data, and transmits the image data with the selected water-mark to the terminal apparatus.

The controller controls the first printer connected to the server to print the original data without the water-mark when the user requests the server to print the transmitted image data and when the access right indicates that the user is permitted to print the original data. Further, the terminal apparatus controls the second printer connected to the terminal apparatus to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data. Claim 27 recites a related method.

Applicants' claims 22 and 24 generally relate to a server connected with a terminal apparatus via a network. The server includes a first memory that stores original data without a water-mark and a second memory that stores a first water-mark associated with a document ID of the original data and with a first user ID indicating a predetermined user, and that stores a second water-mark associated with the same document ID as the first water-mark and with a second user ID indicating a plurality of users including the predetermined user. The server includes a controller that, when the user requests the server to display the original data on a

display of the terminal apparatus by inputting the document ID and the first user ID, determines whether the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID, transforms the original data into image data, selects the first water-mark as a priority with respect to the second water-mark when the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID, adds the selected first water-mark to the image data, and transmits the image data with the selected first water-mark to the terminal apparatus. Claim 28 recites a related method.

With respect to claims 19-21 and 25-27, GUEDALIA et al., the primary reference relied upon by the Examiner, relates to a server that, when it provides image data to a user, determines a mode of display. The server has two policies: a default policy and a privilege policy (col. 10, lines 23-67 and col. 11, lines 1-57). Under the default policy, a user receives a message stating, for example, that "the image you have requested is not available to you". Or a user receives water-marked images (col. 10, lines 47-67 and col. 11, lines 1-6). On the other hand, under the privilege policy, for example, a user whose request is within the scope of the user's entitlements receives unmodified image data. However, a user whose request is outside the scope of the user's entitlements receives a water-marked image (col. 11, lines 7-11).

GUEDALIA et al., relates to a method and a system for server access control and tracking. In particular, GUEDALIA et al., discloses a method and a system for monitoring the activity of an image server which stores a multiplicity of images, at least some of which contain plural image portions. The method includes monitoring which of the plurality of images stored on the image server are accessed, monitoring accessing of individual ones of the plural image portions of each of the multiplicity of images stored on the image server, and providing an output

indication of the number of times that each image portion of the multiplicity of images stored on the image server is accessed. Thus, GUEDALIA et al., is primarily concerned with monitoring activity and the accessing of images on an image server, rather than with controlling of a first and a second printer as recited, for example, in Applicants' claim 19.

However, GUEDALIA et al., fails to disclose a second memory that stores a water-mark associated with a user ID of a user of the terminal apparatus, the second memory storing a plurality of the watermarks, at least one of the plurality of the watermarks being associated with each of a plurality of user IDs.

In setting forth the rejection, the Examiner asserts that GUEDALIA et al., discloses a second memory (column 10, lines 23-29, a database inherently has RAM which is where the watermark is stored before applying to the file). However, at the portion of the disclosure cited by the Examiner, GUEDALIA et al., discusses the operation of the server when the decision is made to provide image data. In particular, GUEDALIA et al., discloses that once the server decides to provide image data, the mode of display is determined. The display modes can be, for example, to render the portion of the image requested in its unmodified form, to watermark the portion of the image requested by embedding watermarks in the image data, or to overlay one or more single colors on the portion of the image requested. However, this disclosure of GUEDALIA et al., is rather remote from the "second memory configured to store a watermark associated with a user ID of a user of the terminal apparatus, the second memory storing a plurality of watermarks, at least one of the plurality of watermarks being associated with each of the plurality of user IDs" as recited in the combination of pending claim 19.

In particular, GUEDALIA et al., merely teaches that under the default policy, when a user is unauthorized, the user receives watermarked images (col.10, lines64-66). Thus,

GUEDALIA et al., does not contain any disclosures regarding a second memory that stores a water-mark associated with a user ID of a user of the terminal apparatus, the second memory storing a plurality of the watermarks, at least one of the plurality of the watermarks being associated with each of a plurality of user IDs.

On the other hand, the pending claims recite a second memory which stores a water-mark associated with a user ID of a user of the terminal apparatus, the second memory storing a plurality of the watermarks, at least one of the plurality of the watermarks being associated with each of a plurality of user IDs. Therefore, the pending claims can obtain results that are unpredictable from the disclosure of GUEDALIA et al. In particular, according to the present invention, when a water-mark is selected based on a user ID, the water-mark can be changed based on the user ID. For example, when Mr. A is a manager, "confidential" can be selected as the water-mark. On the other hand, when Mr. B is an employee, "confidential, not permitted to deliver" can be selected as the water-mark. Further, when Mr. C is a part-timer, "confidential, not permitted to deliver, not permitted to print" can be selected as the water-mark. Since a water-mark is selected based on a user as in the above non-limiting examples, the levels of security of a document can be individually selected and can be set based on each user (see, for example, paragraph [0072] or [0081]). However, GUEDALIA et al., cannot have the above results since GUEDALIA et al., merely determines whether to add a watermark to an image based on whether a user is unauthorized.

Merely because GUEDALIA et al., discloses an image database which, according to the Examiner, "inherently" has a second memory, does not lead to the conclusion that the information stored in the second memory has any particular relevance to the control and printing of the information stored in the second memory as recited in the combination of Applicants'

claim 19. In fact, as noted above, the information stored in the "second memory" of GUEDALIA et al., as identified by the Examiner, does not meet the terms of the second memory as recited in claim 19.

GUEDALIA et al., also fails to disclose a server controlling a first printer connected to the server to print original data without the water-mark when the user requests the server to print the transmitted image data and an access right indicates that the user is permitted to print the original data and, on the other hand, a terminal apparatus controlling a second printer connected to the terminal apparatus (but not to the server) to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data.

As previously noted, GUEDALIA et al., relates to monitoring the activity of an image server and is not at all concerned with printing of the images. GUEDALIA et al., is certainly not concerned with first and second printers that are controlled to print as recited in Applicants' claim 19.

Rather, GUEDALIA et al., merely teaches that when access is granted (Fig. 2, 270), an image server sends, to a user, unmodified image data for display (Fig. 2, 220) and, on the other hand, when access is denied, the image server sends to the user modified image data (water-marked image data) for display (Fig. 2, 280) (col. 11, lines 49-57). In other words, GUEDALIA et al., merely teaches display policies, but does not teach how to control printers, and certainly does not disclose or teach contolling first and second printers, as recited.

On the other hand, the present invention recites a server controlling a first printer connected to the server to print original data without the water-mark when the user requests the server to print the transmitted image data and an access right indicates that the user is permitted

to print the original data and, on the other hand, the present invention recites a terminal apparatus controlling a second printer connected to the terminal apparatus (but not to the server) to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data.

Thus, the pending claims are clearly distinguished over GUEDALIA et al.

The Office Action cites KRASLAVSKY et al., to remedy the acknowledged deficiencies of GUEDALIA et al. However, KRASLAVSKY et al., fails to disclose those features noted above which are lacking in GUEDALIA et al., and KRASLAVSKY et al., relates to a system in which a printer is interfaced to a local area network. KRASLAVSKY et al., discloses a system in which a file server 30 is connected to a printer 32 and to a printer 34, the file server 30 is connected to a PC 22 via a LAN bus 6, and the PC 22 is connected to a printer 24 (Fig. 1).

However, KRASLAVSKY et al., fails to disclose a server controlling a first printer connected to the server to print original data without the water-mark when the user requests the server to print the transmitted image data and an access right indicates that the user is permitted to print the original data and, on the other hand, the terminal apparatus controlling a second printer connected to the terminal apparatus to print the transmitted image data with the selected water-mark when the access right does not indicate that the user is permitted to print the original data. Thus, KRASLAVSKY et al., fails to disclose or teach or supply the above-noted shortcomings of GUEDALIA et al.

Rather, as above-noted, KRASLAVSKY et al., merely teaches a system in which the file server 30 is connected to the printer 32 and to the printer 34, the file server 30 is connected to the PC 22 via the LAN bus 6, and the PC 22 is connected to the printer 24 (Fig. 1). However, KRASLAVSKY et al., fails to teach how to control the printer 32 and the printer 34 connected to

the file server 30 and the printer 24 connected to the PC 22, with respect to image data with a water-mark. In other words KRASLAVSKY et al., contains no disclosure regarding watermarks and would thus provide no reason to modify GUEDALIA et al., to control a first printer in the manner recited in the pending claims.

Even if one were to assume, merely for arguments sake, that the combination of GUEDALIA et al., and KRASLAVSKY et al., would be obvious to one of ordinary skill, such combination would still not teach all the recited elements of Applicants' claims. In this regard, Applicants are not merely claiming a first and a second printer, but rather are claiming the particular control of the first and second printer by the controller of the server or by the terminal apparatus in accordance with whether the access right indicates that the user is permitted to print the original data or does not indicate that the user is permitted to print the original data. And KRASLAVSKY et al., contains no teachings regarding these explicitly recited features of Applicant's invention. Accordingly, even if one were to combine the teachings of GUEDALIA et al., and KRASLAVSKY et al., Applicants' invention as defined, in a non-limiting fashion, by the recitations of claim 19, would not be rendered obvious thereby.

Thus, the recitations of claims 19, 21 and 25-27 are not disclosed, suggested or rendered obvious by the combination of GUEDALIA et al., and KRASLAVSKY et al., whether considered alone or in any proper combination.

Regarding claim 20, NAKAO et al., additionally discloses print log information (records of printing performed previously) (paragraph [0003]). However, NAKAO et al., fails to disclose the above-noted features of, e.g., claims 19 and 27 that have been shown to be missing from the references applied thereagainst. Therefore, the features recited in pending claim 20 are not

disclosed or rendered obvious over GUEDALIA et al., in view of KRASLAVSKY et al., and NAKAO et al.

Accordingly, each of claims 19-21 and 25-27 are not disclosed, suggested or rendered obvious by the documents applied in the Official Action.

With respect to claims 22, 24 and 28, as above explained, GUEDALIA et al., teaches that the server has two policies: a default policy and a privilege policy (col. 10, lines 23-67 and col. 11, lines 1-57). Under the default policy, a user receives a message stating, for example, that "the image you have requested is not available to you". Or a user receives water-marked images (col. 10, lines 47-67 and col. 11, lines 1-6). On the other hand, under the privilege policy, for example, a user whose request is within the scope of the user's entitlements receives unmodified image data. However, a user whose request is outside the scope of the user's entitlements receives a water-marked image (col. 11, lines 7-11).

However, in GUEDALIA et al., one and only one of a default policy and a privilege policy is selected, based on whether or not a user is authenticated (Fig. 2, 230, 240 and 250, and col. 11, lines 19-23). In other words, when the user is authenticated, the privilege policy is applied. On the other hand, when the user is not authenticated, the default policy is applied. Thus, in GUEDALIA et al., for example, when the user is authenticated, both of the privilege policy and the default policy can not be applied. Therefore, one of the privilege policy and the default policy does not need to have a "priority" with respect to the other, as recited e.g. in claim 22.

In particular, according to various of the pending claims, when the document ID and the first user ID are input, the first water-mark associated with the first user ID and the second water-mark associated with the second ID can be selected, since both of the first user ID and the second

user ID can indicate a predetermined user. The second user ID indicates a plurality of users, but the plurality of the users includes the predetermined user. Thus, in the present invention, the server "selects" the first water-mark as a "priority" with respect to the second water-mark, when the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID.

In addressing claims 22, 23, 24 and 28, the Examiner asserts that the GUEDALIA et al., the primary reference, additionally discloses having a privileged user and a nonprivileged user group. However, the portion of GUEDALIA et al., to which the Examiner makes reference merely discusses what happens in when a user is authenticated, in which case the privilege policy is applied and what happens when a user is not authenticated, in which case the default policy is applied. Examples of the various possible privilege policies and default policies are set out. However this disclosure of GUEDALIA et al., does not in any way teach the operation of the server as recited in claim 22.

Thus, GUEDALIA et al., does not disclose the features of, e.g., claims 22, 24 and 28.

The Office Action applies STEFIK et al., to teach the claimed features acknowledged to be lacking in GUEDALIA et al. In this regard, STEFIK et al., relates to a trusted rendering system for controlling printing of digital work. The trusted rendering system facilitates the protection of rendered digital works and controls the printing of digital works through water-mark information.

However, STEFIK et al., fails to disclose a server that, when the user requests the server to display the original data on a display of the terminal apparatus by inputting the document ID and the first user ID, determines whether the first water-mark and second water-mark are stored in the second memory with respect to the document ID and the first user ID, transforms the

original data into image data, selects the first water-mark as a priority with respect to the second water-mark when the first water-mark and the second water-mark are stored in the second memory with respect to the document ID and the first user ID, adds the selected first water-mark to the image data, and transmits the image data with the selected first water-mark to the terminal apparatus.

Rather, STEFIK et al., merely teaches that a water-mark is embedded in a digital work for printing the digital work. In other words, STEFIK et al., does not teach that one of two water-marks can be selected as a priority, when one common document ID is associated with both of the two water-marks, as recited.

In setting forth the rejection, the Examiner asserts that "STEFIK et al., discloses having the username in the watermark of a specific document along with other various information such as a document name and place of printing (Fig. 6). The water-mark is selected and added to the document". However, the pending claims do not recite having, in a watermark, a username with the other various information. Rather, various of the pending claims recite selection of a water-mark with respect to a document ID and with respect to a user ID or selection of a water-mark associated with a user ID and with a folder ID. These features in the respective claim combinations are not taught, disclosed, or rendered obvious by any of the cited and applied references. Further, STEFIK et al., fail to disclose how to select one water-mark when a plurality of water-marks are associated with one common document. Rather, STEFIK et al., merely teach that a plurality of water-marks are embedded in a digital work (Fig. 6).

Thus, STEFIK et al., does not contain any disclosure regarding the server recited in claims 22, 24 and 28. Thus, claims 22, 24 and 28 are not disclosed by STEFIK et al., or the combination of GUEDALIA et al., and STEFIK et al.

Accordingly, Applicants respectfully request reconsideration and withdrawal of each of the outstanding rejections, and an indication of the allowability of all the claims pending in the present application, in due course.

The various dependent claims pending in the present application are also submitted to be patentable over the various combinations of references applied by the Examiner, both based upon their dependence from a shown to be allowable independent claim as well as based upon the specific recitations set forth in each pending dependent claim.

SUMMARY AND CONCLUSION

Applicants have made a sincere effort to place the present application in condition for allowance and believe that they have now done so. Applicants have cancelled two claims and have amended the rejected claims to enhance clarity and have submitted the same for reconsideration by the Examiner. With respect to the pending claims, Applicants have pointed out the features thereof and have contrasted the features of the pending claims with the disclosures of the applied references. Applicants have pointed out the shortcoming of the cited references individually as well as in the manner combined by the Examiner, with respect to the recitations of the pending claims and have pointed out the shortcomings of the applied references. Accordingly, Applicants have provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully request an indication of the allowability of all the claims pending in the present application, in due course.
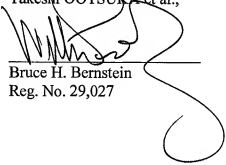
The amendments to the claims which have been made in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

P24111.A08

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

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